



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

Mr. James L. Kunstman, PhD
PBI/Gordon Corporation
Post Office Box 014090
Kansas City, MO 64101

JAN 24 2013

Dear Dr. Kunstman:

Subject: Amendment- - response to Agency letter dated February 14, 2012
Gordon's® Permethrin 10 Livestock and Premise Spray
EPA Registration Number 2217-853
Your submission dated September 7, 2012

The application referred to above, submitted in connection with registration under the Federal Insecticide, Fungicide, and Rodenticide Act, as amended, is acceptable with the following comments:

1. Replace the Hazards to Humans and Domestic Animals section with "Causes skin irritation. Do not get on skin or on clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse. Wear Coveralls worn over short-sleeved shirt and short pants, socks, chemical resistant footwear, and chemical-resistant gloves (such as those made of Barrier Laminate, Nitrile Rubber, or Vitro). Harmful if inhaled. Avoid breathing vapors or spray mists. Causes moderate eye irritation. Avoid contact with eyes. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals.

A copy of the label is enclosed for your records.

A copy of the review is enclosed for your records.

If you have any questions regarding this action, please contact Linda A. DeLuise of my team at (703) 305-5428.

Sincerely yours,

A handwritten signature in black ink, appearing to read "Richard A. Gebken".

Richard Gebken
Product Manager (10)
Insecticide Branch
Registration Division (7505P)

Enclosures

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GORDON'S® PERMETHRIN 10 LIVESTOCK AND PREMISE SPRAY

EPA Reg. No. 2217-853

ACCEPTED
with COMMENTS
In EPA Letter Dated
January 24, 2013
Under the Federal Insecticide,
Fungicide, and Rodenticide Act,
as amended, for the pesticide
registered under EPA Reg. No.
2217-853

DO NOT USE ON CATS

ACTIVE INGREDIENT:

Permethrin 10.0%

INERT INGREDIENTS: 90.0%

TOTAL 100.0%

Cis/trans ratio: Max. 65% (+/-) trans and min. 35% (+/-) cis.

Contains petroleum distillates

KEEP OUT OF REACH OF CHILDREN

WARNING

STOP! READ THE ENTIRE LABEL FIRST. OBSERVE ALL PRECAUTIONS AND FOLLOW DIRECTIONS CAREFULLY.

PRECAUTIONARY STATEMENTS

Hazards to Humans and Domestic Animals

WARNING: Harmful if inhaled. Causes moderate eye irritation and skin irritation. Do not get on skin or clothing. Prolonged or frequently repeated skin contact may cause allergic reactions in some individuals. Avoid breathing vapor or spray mist and contact with eyes.

Personal Protective Equipment (PPE)

Some materials that are chemical-resistant to this product are barrier laminate, nitrile rubber, neoprene rubber, and Viton. If you want more options, follow the instructions for category E on an EPA chemical-resistance category selection chart.

Applicators using ULV cold foggers or fog/mist generators in indoor spaces must wear:

- Coveralls over long-sleeved shirt and long pants,
- Chemical-resistant gloves made of barrier laminate, nitrile rubber, neoprene rubber or viton,
- Chemical resistant footwear plus socks, and
- Chemical-resistant headgear, if overhead exposure.

All other mixers, loaders, applicators (including applicators using ULV cold foggers and/or fog/mist generators in indoor spaces) and other handlers must wear:

- Coveralls worn over short-sleeved shirt and short pants,
- Chemical-resistant footwear plus socks,
- Chemical-resistant gloves made of barrier laminate, nitrile rubber, neoprene rubber or viton,
- Chemical-resistant apron for mixers/loaders, persons cleaning equipment, and persons exposed to the concentrate and for handlers performing animal dip applications,



An Employee-Owned Company
1217 West 12th Street
Kansas City, Missouri 64101

User Safety Recommendations

- Users should wash hands before eating, drinking, chewing gum, using tobacco, or using the toilet.
- Users should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
- Users should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

User Safety Requirements

Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables exist, use detergent and hot water. Keep and wash PPE separately from other laundry. Discard clothing and other absorbent materials that have been drenched (except as required by directions for use) or heavily contaminated with this product's concentrate. Do not reuse them.



DO NOT USE ON CATS. May be toxic or potentially fatal if applied to or ingested by cats. Accidental application to cats and/or grooming a recently treated dog may result in tremors and/or uncoordinated muscle movements. If this occurs, immediate veterinary care should be provided.

First Aid

If on skin or on clothing:	<ul style="list-style-type: none"> • Take off contaminated clothing. • Rinse skin immediately with plenty of water for 15 - 20 minutes. • Call a poison control center or doctor for treatment advice.
If in eyes:	<ul style="list-style-type: none"> • Hold eye open and rinse slowly and gently with water for 15-20 minutes. • Remove contact lenses, if present, after the first 5 minutes, then continue rinsing eye. • Call a poison control center or doctor for treatment advice.
If inhaled:	<ul style="list-style-type: none"> • Move person to fresh air. • If person is not breathing, call 911 or an ambulance, then give artificial respiration, preferably by mouth-to-mouth, if possible. • Call a poison control center or doctor for further treatment advice.
If swallowed:	<ul style="list-style-type: none"> • Immediately call a poison control center or doctor. • Do not induce vomiting unless told to do so by a poison control center or doctor. • Do not give any liquid to the person. • Do not give anything by mouth to an unconscious person.
<p>Have the product container or label with you when calling a poison control center or doctor or going for treatment. For additional information in case of emergency, call toll free 1-877-800-5556.</p> <p>Note to Physician and Veterinarians: Contains petroleum distillates. Vomiting may cause aspiration pneumonia.</p>	

Environmental Hazards

This pesticide is extremely toxic to aquatic organisms, including fish and invertebrates. Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean water mark. Do not apply when weather conditions favor drift from treated areas. Drift and runoff from treated areas may be hazardous to aquatic organisms in neighboring areas. Do not contaminate water when disposing of equipment wash waters.

This pesticide is highly toxic to bees exposed to direct treatment on blooming crops or weeds. Do not apply this product or allow it to drift to blooming crops or weeds while bees are actively visiting the treatment area.

Physical Or Chemical Hazards

Combustible. Do not use or store near heat or open flame. Do not use this product in or on electrical equipment due to the possibility of shock hazard.

DIRECTIONS FOR USE

It is a violation of Federal law to use this product in a manner inconsistent with its labeling.

Shake or stir product thoroughly before using or reusing diluted emulsion. To prepare dilutions, the concentrate should first be stirred or agitated well. Add the required amount of concentrate to water and blend thoroughly. Do not hold dilutions for more than 24 hours.

Do not allow spray treatment to contaminate pasture land, crop land, or water supplies. Do not use on crops used for food, forage or pasture.

1. Precautions And Restrictions

For surface spray:

- Except when applying to livestock and dogs, do not enter or allow others to enter treated area until sprays have dried.

For space spray:

- Except when applying to livestock and dogs, do not enter or allow others to enter until vapors, mists, and aerosols have dispersed, and the treated area has been thoroughly ventilated.

Application restrictions:

- Except when applying to livestock and dogs, do not apply this product in a way that will contact workers or other persons, either directly or through drift.
- Except when applying to livestock and dogs, only protected handlers may be in the area during application.
- Do not breathe dust, vapors, or spray mist.
- Do not apply when food is present.
- Application is prohibited directly into sewers or drains, or to any area like a gutter where drainage to sewers, storm drains, water bodies, or aquatic habitat can occur. Do not allow the product to enter any drain during or after application.

When used in dairy barns or facilities:

- Close milk bulk tank lids to prevent contamination from spray and from dead or falling insects. Remove or cover milking utensils before application. Wash teats of animals before milking.
- Not for broadcast use on indoor surfaces.
- Not for use in outdoor residential misting systems.
- Not for use in commercial animal premise automatic misting systems.

All outdoor applications must be limited to spot or crack-and-crevice treatments only, except for the following permitted uses:

- Treatments to soil or vegetation around structures;
- Applications to lawns, turf, and other vegetation;
- Applications to building foundations, up to maximum height of 3 feet.

Other than applications to building foundations, all outdoor applications to impervious surfaces such as sidewalks, driveways, patios, porches and structural surfaces (such as windows, doors, and eaves) are limited to spot crack-and-crevice applications, only.

- Do not water the treated area to the point of run-off.
- Do not make applications during rain.
- Not for use in outdoor residential misting systems.

2. Animal Premises -- Surface Spray

Application sites: Farm Premises (Barns, Dairies, Loafing Sheds, Milking Parlors, Feed Lots, Stables, Paddocks, Poultry and Livestock Housing).

Application interval: 2 weeks as needed.

Pests Controlled	Use Directions	Dilutions Rate (parts product to parts water)	Spray Preparation
Horse Flies, Stable Flies, Lesser House Flies and Other Manure Breeding Flies; Fleas; Lice; Mites; Ticks (including Deer Tick). Aids In Control of Cockroaches, Mosquitoes, Spiders.	Initial clean up of severe insect infestation: Use 1 gallon of spray solution per 750 to 1,000 sq. ft.	1:19	<u>Amount Product per Water Volume</u> 6.7 fl.oz. 1.0 gal 8.0 fl.oz. 1.2 gal 16 fl.oz. (1pt) 2.4 gal 32 fl.oz. (1qt) 4.8 gal 1 gallon 19.0 gal
	Normal infestations: Use 1 gallon of spray solution per 750 to 1,000 sq. ft.	1:100	<u>Amount Product per Water Volume</u> 1.33 fl.oz. 1.0 gal 8.0 fl.oz. 6.25 gal 16 fl.oz. (1pt) 12.5 gal 32 fl.oz. (1qt) 25.0 gal 1 gallon 100.0 gal

3. Animal Premises -- Space Spray

Application sites: Cattle Barns, Horse Barns, Swine Houses, Kennels, Milking Parlors, Milk Rooms, Dairies, Poultry Houses, Feed Lots, Stables, and Paddocks.

Application interval: Daily as needed.

Pests Controlled	Use Directions	Dilutions Rate (parts product to parts water)	Spray Preparation
Flies, Mosquitoes, Gnats.	Fog or Fine Mist: Direct the spray toward the ceiling and upper corners until the area is filled with mist. Use about 2 fl.oz. per 1,000 sq. ft. of space. Close doors and windows before spraying and keep closed for 10 to 15 minutes. Vacate the treated area and ventilate before reoccupying	1:19	<u>Amount Product per Water Volume</u> 6.7 fl.oz. 1.0 gal 8.0 fl.oz. 1.2 gal 16 fl.oz. (1pt) 2.4 gal 32 fl.oz. (1qt) 4.8 gal 1 gallon 19.0 gal

4. Dairy or Beef Cattle, Horses, Sheep, and Goats

Pests Controlled	Use Directions	Dilutions Rate (parts product to parts water)	Spray Preparation

Table 3. Directions for Dairy or Beef Cattle, Horses, Sheep, and Goats			
Pests Controlled	Use Directions	Dilutions Rate (parts product to parts water)	Spray Preparation
Horn Flies, House Flies, and Mosquitoes	Spray to cover entire animal. Spray lactating dairy cows only after milking is completed. Repeat treatment at 5 to 12 days for small populations or as needed for large populations.	1:100	<u>Amount Product per Water Volume</u> 1.33 fl.oz. 1.0 gal 8.0 fl.oz. 6.25 gal 16 fl.oz. (1pt) 12.5 gal 32 fl.oz. (1qt) 25.0 gal 1 gallon 100.0 gal
Stable Flies, Horse Flies and Deer Flies.	Apply a quart of spray solution per adult animal as a whole body treatment. Repeat treatment daily as needed.	1:100	<u>Amount Product per Water Volume</u> 1.33 fl.oz. 1.0 gal 8.0 fl.oz. 6.25 gal 16 fl.oz. (1pt.) 12.5 gal 32 fl.oz. (1qt.) 25.0 gal 1 gallon 100.0 gal
Horn Flies, Face Flies, Stable Flies and Ear Ticks.	For spot treatments with hand-operated sprayers that deliver large droplets. Apply to the face of animal in the morning before release to pasture. Mix in organic oil, mineral oil or vegetable oil or dilute in water. Apply 1/2 fl.oz. of spray solution per ear or 2 to 4 fl.oz. of spray solution on face or 12 to 16 fl.oz. of spray solution along backline. Repeat treatment daily as needed.	1:64	<u>Amount Product per Oil or Water</u> 2.0 fl.oz. 1.0 gal 4.0 fl.oz. 2.0 gal 6.0 fl.oz. 3.0 gal 8.0 fl.oz. 4.0 gal
Horn Flies, Face Flies, Stable Flies and Ear Ticks.	Back rubber or self oiler using organic oil, mineral oil or fuel oil. Recharge backrubber as needed.	1:80	<u>Amount Product per Oil Volume</u> 8.0 fl.oz. 5 gal 16 fl.oz. (1pt) 10 gal 32 fl.oz. (1qt) 20 gal
Sheep keds	Wet all portions of the body by dipping or spraying. Adjust the spray pressure to allow the spray solution to penetrate the wool. Treat at a rate sufficient to wet the animal.	1:100	<u>Amount Product per Water Volume</u> 1.33 fl.oz. 1.0 gal 8.0 fl.oz. 6.25 gal 16 fl.oz. (1pt) 12.5 gal 32 fl.oz. (1qt) 25.0 gal 1 gallon 100.0 gal

5. Swine

Table 4. Directions for Swine			
Pests Controlled	Use Directions	Dilutions Rate (parts product to parts water)	Spray Preparation
Mange Mites	Spray or dip animals. Retreat after 14 days, spraying walls and floor and space bedding to kill late hatching, developing stages. Do not ship swine for slaughter within 5 days of last treatment.	1:400	<u>Amount Product per Water Volume</u> 1.0 fl.oz. 3.1 gal 8.0 fl.oz. 25 gal 16 fl.oz. (1pt) 50 gal 32 fl.oz. (1qt) 100 gal 1 gallon 400 gal
Blow Flies, Flies, Mosquitoes, Hog Lice, Fleas, Ticks, Including Deer Tick.	Spray or dip animals. Apply 1 pint of spray solution per pig, especially around ears. Do not ship swine for slaughter within 5 days of last treatment.	1:400	<u>Amount Product per Water Volume</u> 1.0 fl.oz. 3.1 gal 8.0 fl.oz. 25 gal 16 fl.oz. (1pt) 50 gal 32 fl.oz. (1qt) 100 gal 1 gallon 400 gal

6. Poultry

Table 5. Directions for Poultry			
Pests Controlled	Use Directions	Dilutions Rate (parts product to parts water)	Spray Preparation
Poultry Mites, Northern Fowl Mites, Lice	Use a fine mist to deliver 0.5 fl.oz. of spray solution per bird, or 1 gallon of spray solution per 100 birds. Spray roosts, walls and nests or cages.	1:200	<u>Amount Product per Water Volume</u> 8.0 fl.oz. 12.5 gal 16 fl.oz. (1pt) 25 gal 32 fl.oz. (1qt) 50 gal 1 gallon 200 gal

7. Dog Premises -- Surface Spray

Application sites: Dog premises: Dog Houses

Table 6. Directions for Dog Premises -- Surface Spray			
Pests Controlled	Use Directions	Dilutions Rate (parts product to parts water)	Spray Preparation
Fleas, Flies, Ticks, Lice Mange (adult and larvae).	Surface spray: Timing and frequency of applications should be based on pest populations reaching nuisance levels, but accompanying manure removal and sanitation practices should precede sprays. Do not spray feed, food or water. Repeat at 2 week intervals as needed.	1:100	<u>Amount Product per Water Volume</u> 1.33 fl.oz. 1.0 gal 8.0 fl.oz. 6.25 gal 16 fl.oz. (1pt) 12.5 gal 32 fl.oz. (1qt) 25.0 gal 1 gallon 100.0 gal

8. Dogs -- Direct Application

Table 7. Directions for Dogs -- Direct Application			
Pests Controlled	Use Directions	Dilutions Rate (parts product to parts water)	Spray Preparation
Fleas; Ticks, Including Deer Ticks; Lice; Mange	Thoroughly wet the animal by dipping, sponging or spraying. Allow animal to dry without rinsing or toweling. Do not repeat treatment for 7 days. Consult a veterinarian before using this product on debilitated, aged, pregnant, medicated or nursing animals. Sensitivities may occur after using ANY pesticide product for pets. If signs of sensitivity occur, bathe your pet with mild soap and rinse with large amounts of water. If signs continue, consult a veterinarian immediately.	1:200	<u>Amount Product per Water Volume</u> 0.65 fl. oz. 1.0 gal 1.0 fl. oz. 1.5 gal 8.0 fl.oz. 12.5 gal 16 fl.oz. (1pt) 25 gal 32 fl.oz. (1qt) 50 gal 1 gallon 200 gal

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage and disposal.

PESTICIDE STORAGE: Store upright at room temperature. Avoid exposure to extreme temperatures.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or

at an approved waste disposal facility.

[For Plastic Containers – Nonrefillable with capacities equal to or less than 5 gallons:]

CONTAINER HANDLING: Nonrefillable container. Do not reuse or refill this container.

Triple rinse container (or equivalent) promptly after emptying.

Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container 1/4 full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times.

Then offer for recycling, if available, or puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

[For Plastic Containers – Nonrefillable with capacities greater than 5 gallons:]

CONTAINER HANDLING: Nonrefillable container. Do not reuse or refill this container.

Triple rinse container (or equivalent) promptly after emptying.

Triple rinse as follows: Empty the remaining contents into application equipment or a mix tank. Fill the container 1/4 full with water. Replace and tighten closures. Tip container on its side and roll it back and forth, ensuring at least one complete revolution, for 30 seconds. Stand the container on its end and tip it back and forth several times. Turn the container over onto its other end and tip it back and forth several times. Empty the rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Repeat this procedure two more times.

Then offer for recycling, if available, or puncture and dispose of in a sanitary landfill, or by incineration, or, if allowed by state and local authorities, by burning. If burned, stay out of smoke.

[For Refillable Containers:]

CONTAINER HANDLING: Refillable container. Refill this container with pesticide only. Do not reuse this container for any other purpose.

Container cleaning: Cleaning the container before final disposal is the responsibility of the person disposing of the container. Cleaning before refilling is the responsibility of the refiller.

To clean the container before final disposal, empty the remaining contents from this container into application equipment or a mix tank. Fill the container about 10 percent full with water. Agitate vigorously or recirculate water with the pump for 2 minutes. Pour or pump rinsate into application equipment or rinsate collection system. Repeat this rinsing procedure two more times.

LIMITED WARRANTY AND DISCLAIMER

The manufacturer warrants only that the chemical composition of this product conforms to the ingredient statement given on the label, and that the product is reasonably suited for the labeled use when applied according to the Directions for Use.

TO THE EXTENT CONSISTENT WITH APPLICABLE LAW, THE MANUFACTURER NEITHER MAKES NOR INTENDS ANY OTHER EXPRESS OR IMPLIED WARRANTIES, INCLUDING ANY WARRANTY OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE, WHICH ARE EXPRESSLY DISCLAIMED. This limited warranty does not extend to the use of the product inconsistent with label instructions, warnings or cautions. Any damages arising from a breach of the manufacturer's warranty

shall be limited to direct damages, and shall not include indirect or consequential damages such as loss of profits or values, except as otherwise provided by law.

The terms of this Limited Warranty and Disclaimer cannot be varied by any written or verbal statements or agreements. No employee or agent of the seller is authorized to vary or exceed the terms of this Limited Warranty and Disclaimer in any manner.

APPENDIX

1. Statements which may appear on different label components depending on packaging configuration.

- See next panel for additional Precautionary Statements and First Aid
- Net Contents: 1 pint, 1 quart, 0.5 gallon and 1 gallon
- EPA Est. No. 2217-KS-2

2. Advertising claims that may be presented on container labeling, advertisements, brochures, and other marketing/sales promotional materials:

- For Use On Livestock: Cattle (Beef and Dairy), Goats, Sheep, Swine, Horses and Poultry.
- A Broad Spectrum Multi-Use Insecticide

DOCUMENT CONTROL INFORMATION

1. Unique Label Identifier: 002217-00853.20130124.amend-proposed-clean.docx

2. Reason for Issue: Various changes pertaining to re-registration. EPA comments #2